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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

LANCE BROOKS,

Defendant.

Case: 2:22-cr-20173  
Judge: Cox, Sean F.  
MJ: Stafford, Elizabeth A.  
Filed: 03-29-2022  
INDI USA VS BROOKS (DP)

VIOLATION:  
18 U.S.C. § 922(g)(1)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

**18 U.S.C. § 922(g)(1) - Felon in Possession of a Firearm and Ammunition**

On or about February 8, 2022, in the Eastern District of Michigan, the defendant, LANCE BROOKS, knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit: one 9 x 19mm Polymer80, model PF940c, semi-automatic pistol; and ammunition, to wit: one (1) round of 9mm caliber Federal and one (1) round of 9mm caliber Winchester ammunition loaded in a magazine, ten (10) rounds of .45 caliber Remington ammunition, one (1) round of .45 caliber Sig Sauer ammunition, five (5) rounds of 9mm caliber Remington ammunition, six

(6) rounds of 9mm caliber Winchester ammunition, and one (1) round of 9mm caliber Federal ammunition, said firearm and ammunition having previously been in and affecting interstate or foreign commerce, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**FORFEITURE ALLEGATION**

**18 U.S.C. § 924(d) and 28 U.S.C. § 2461**

The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d), together with Title 28, United States Code, Section 2461(c).

Upon conviction of the offense charged in Count One of this Indictment, Defendant shall forfeit to the United States any firearm or ammunition involved in said offense, including, but not limited to one 9 x 19mm Polymer80, model

*[Space left intentionally blank.]*

PF940c, semi-automatic pistol, resembling a Glock Model 19, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

**THIS IS A TRUE BILL.**

*s/Grand Jury Foreperson*  
GRAND JURY FOREPERSON

DAWN N. ISON  
United States Attorney

*s/Benjamin C. Coats*  
BENJAMIN C. COATS  
Chief, General Crimes Unit  
Assistant United States Attorney

*s/Tara Mathena Hindelang*  
TARA MATHENA HINDELANG  
Assistant United States Attorney  
211 W. Fort Street, Suite 2001  
Detroit, MI 48226-3211  
(313) 226-9543  
Tara.Hindelang@usdoj.gov  
P78685

Dated: March 29, 2022

|  |                                  |             |
|--|----------------------------------|-------------|
| United States District Court<br>Eastern District of Michigan | <b>Criminal Case Cover Sheet</b> | Case Number |
|--|----------------------------------|-------------|

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

|  |                             |
|--|-----------------------------|
| <b>Companion Case Information</b>  | Companion Case Number:      |
| This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> : | Judge Assigned:             |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No      | AUSA's Initials: <u>TMH</u> |

Case Title: USA v. LANCE BROOKS

County where offense occurred : Wayne

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☐ Indictment/ ☐ Information --- no prior complaint.

☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 22-mj-30138 ]

☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

### **Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- ☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

| <u>Defendant name</u> | <u>Charges</u> | <u>Prior Complaint (if applicable)</u> |
|-----------------------|----------------|--|
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

March 29, 2022

Date

Tara Mathena Hindelang

Tara Mathena Hindelang  
Assistant United States Attorney  
211 W. Fort Street, Suite 2001  
Detroit, MI 48226-3277  
Phone: (313) 226-9543  
Fax: (313) 226-2372  
E-Mail address: Tara.Hindelang@usdoj.gov  
Attorney Bar #: P78685

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.